c. As applicable, an explanation of the reasons the State has not been able to complete the development of such assessments despite making every effort.

While oral language translations of the state content-area tests are available for Spanish speakers, funding challenges preclude the state from providing Spanish-translated written versions of state tests at this time.

4. Statewide Accountability System and School Support and Improvement Activities (ESEA section 1111(c) and (d)):

In June 2016, Oklahoma began to study and develop recommendations for a new statewide assessment system and a new system of differentiated accountability. The OSDE held meetings the following month in all regions of the state: Broken Arrow, Sallisaw, Durant, Edmond, Woodward and Lawton. These meetings yielded responses to various questions addressing the desired purposes of accountability and preferred measures for it. This regional feedback was incorporated into the discussions of the Oklahoma Assessment and Accountability Task Force (see Appendix 7 for a list of members), which deliberated over many technical, policy and practical issues associated with implementing improved assessment and accountability systems. Representing educators, parents, business and community leaders, tribal leaders and lawmakers, the task force met four times between Aug. 4 and Nov. 9, 2016, and culminated in a set of recommendations for improvement that eventually went before the Oklahoma State Board of Education (OSBE). The 95-member task force met with experts in assessment and accountability to consider each of the study requirements and provide feedback to improve the state's assessment and accountability systems. Two of those experts also served as the primary facilitators of the task force: Juan D'Brot, Ph.D., of the National Center on the Improvement of Educational Assessment, and Marianne Perie, Ph.D., of the University of Kansas' Achievement and Assessment Institute. At each meeting the group discussed federal and state law requirements, research and best practices in assessment and accountability development. Feedback from the task force was subsequently incorporated into the OSDE's recommendations to the OSBE on the new accountability system (the full report is in Appendix 7). The recommendations were approved by the state Legislature and governor in March 2017. The guiding principle of Oklahoma's new accountability system is that all students can grow and all schools can improve. Oklahoma's accountability system (Oklahoma School Report Cards~~A-F School Report Card~~) is based on a multi-measure approach, giving multiple grades for each indicator as well as a cumulative overview grade. To clarify the purpose of the system, the OSDE considered the recommendations of Robert L. Linn:[12]

12 Robert L. Linn, "The Design and Evaluation of Educational Assessment and Accountability Systems," National Center for Research on Evaluation, Standards and Student Testing, April 2001.

- What results will be given to parents?
- What will be done with school-level results?

- How much emphasis should be placed on status versus improvement?

As is recommended by the Education Commission of the States' recently published report, the Oklahoma report card will be easy to find, easy to understand and include indicators essential for measuring school and district performance.[13]

When developing the new ~~A-F School Report Card system~~ Oklahoma School Report Cards, the indicators, calculation and design elements were grounded in the OSDE 8-Year Strategic Plan. Specifically, the following strategies are achieved through the A-F Report Card:

STRATEGY 1.4 Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning.

STRATEGY 2.3 Provide district and school leaders with the training and support needed to improve instruction in their schools.

STRATEGY 4.2 Leverage technology systems and governance collaboration to improve access to data while protecting student information, allowing the OSDE and districts to make data-informed decisions.

i. Subgroups (ESEA section 1111(c)(2)):

a. List each major racial and ethnic group the State includes as a subgroup of students, consistent with ESEA section 1111(c)(2)(B).

The subgroups Oklahoma includes for reporting purposes are as follows:

- Economically disadvantaged students;
- Students with disabilities;
- English learners (ELs); and
- Students from major racial and ethnic groups (White, Hispanic/Latino, Black/ African American, American Indian, Asian/Pacific Islander and Two or More Races).

The OSDE will also report academic performance for homeless students, students in foster care and students with a parent who is a member of the Armed Forces as required by ESEA section 1111(h)(1)(C). Eventually, the OSDE would like to include students with incarcerated parents as a separate subgroup in its reporting of student performance. It is also important to note that the OSDE will use different subgroups for the academic achievement indicator in the state's accountability system.

b. If applicable, describe any additional student groups of students other than the statutorily required subgroups (i.e., economically disadvantaged students, students from major racial and ethnic groups, children with disabilities, and English learners) used in the Statewide accountability system.

Not applicable.

c. Does the State intend to include in the English learner subgroup the results of students previously identified as English learners on the State assessments required under ESEA section 1111(b) (2)(B)(v)(I) for purposes of State accountability (ESEA section 1111(b)(3)(B))? Note that a student's results may be included in the English learner subgroup for not more than four years after the student ceases to be identified as an English learner.

☑ Yes ☐ No

d. If applicable, choose one of the following options for recently arrived English learners in the State:

☐ Applying the exception under ESEA section 1111(b)(3)(A)(i); or

☑ Applying the exception under ESEA section 1111(b)(3)(A)(ii); or

☐ Applying the exception under ESEA section 1111(b) (3)(A)(i) or under ESEA section 1111(b)(3)(A)(ii). If this option is selected, describe how the State will choose which exception applies to a recently arrived English learner.

Oklahoma has chosen to utilize the exception provided under ESEA section 1111(b)(3)(A) (ii), which will allow the state to administer ELA and mathematics assessments to recently arrived English learners while excluding those test scores from accountability in their first year. By using the year-one test scores as a baseline, these students' scores will be included in the accountability system as part of the growth indicator in year two. Finally, in year three, test scores for recently arrived English learners will be fully incorporated into the accountability measures.

ii. Minimum N-Size (ESEA section 1111(c)(3)(A)):

a. Provide the minimum number of students that the State determines are necessary to be included to carry out the requirements of any provisions under Title I, Part A of the ESEA that require disaggregation of information by each subgroup of students for accountability purposes.

The Assessment and Accountability Task Force discussed the benefits and limitations of policies regarding the minimum number of students (N-size) for reporting purposes. A large minimum N-

size can bolster the reliability of the resulting decisions, but because it excludes certain populations from the system who do not meet the minimum sample size, it also undermines the validity of the system to meaningfully differentiate schools.
The OSDE is committed to including as many schools as appropriately possible in accountability calculations. The state's goal is to maintain the integrity of the accountability system and capture at least the same number of schools as previous iterations of the while improving the consistency and validity of identification.

The OSDE has examined historical differentiation data and has concluded that using an n-size of 10 has resulted in too much volatility in differentiating schools year over year, which undermines the validity of the system to meaningfully differentiate schools. Based on simulations using historical and current enrollment data, the OSDE has determined that an N-size of 25 meets both sensitivity and inclusion needs.

The OSDE will also be leveraging the previously approved multiple-year model to pool data across years for schools that do not meet the minimum N-size threshold. This allows for at least as many schools identified, with evidence suggesting an increased sensitivity of subgroup and school inclusion using an N-size of 25.

b. Describe how the minimum number of students is statistically sound.

Federal requirements restrict the N-size for accountability purposes to not more than 30; however, Oklahoma has chosen an N-size of 10 for all accountability student groups and indicators.
The N-size of 10 was determined without empirical data to test inclusivity and sensitivity goals. The system's previous use an N-size of 10 intended to identify the maximum number of schools. After a review of empirical evidence, it increased the volatility of school scores and resulted in a higher than desired level of "bounce" in and out of performance levels on indicators. This, along with the argument presented by Hill and DePascale (2003) suggests a need to increase our N-size.

After examining historical and current-year data, increasing the N-size to 25 and leveraging multiple-years of pooled data, we are able to capture an increased number of schools when compared to an N-size of 10. This allows for school performance changes to be less of a statistical aberration of sampling and more of a condition of power to detect real change in performance.

Shifting to an N-size of 25, inclusive of the multi-year data, captures an additional 1% of schools when compared to the model using an N-size of 10. Thus, the increase in N-size and use of multi-year data meets both sensitivity and inclusion needs.

c. Describe how the minimum number of students was determined by the State, including how the State collaborated with teachers, principals, other school leaders, parents, and other stakeholders when determining such minimum number.

The Oklahoma Legislature directed the OSBE to evaluate the state's current assessment and accountability systems and make recommendations for the future. As a result, the OSDE held regional meetings across the state and convened the Oklahoma Assessment and Accountability Task Force to deliberate over the many technical, policy and practical issues, including the minimum N-size associated with implementing an approved assessment and accountability system. Those giving input included teachers, Pre-K-12 administrators, higher education representatives, career technical representatives, parents, legislators, business representatives, tribal representatives and other community members. In the Oklahoma ESSA State Plan Draft 1 Survey, stakeholders were asked to respond to the question of whether an N of 30 for accountability was reasonable. Many comments reflected the desire to see a lower N-size to ensure the maximum number of students is included in accountability; ~~therefore, the state has selected an N-size of 10.~~ After examining empirical evidence using the most recent three years of accountability data, the state has determined that an N-size of 25 meets a sufficient threshold for consistency and the priorities of the task force to include the greatest number of students and school in accountability. This is an increase from the system's original N-size of 10, but leads to an increase in the number of school eligible for accountability when factoring in the small school multi-year data model, which was previously approved.

d. Describe how the State ensures that the minimum number is sufficient to not reveal any personally identifiable information.[14]

Personally identifiable information is protected in multiple ways. First, Oklahoma ensures that student information remains private by employing complementary suppression of the information when all students score at a certain level (for example, 100% graduation rate) or when no students score at a certain level (for example, 0% graduation rate). Oklahoma also employs complementary suppression within student groups that are mutually exclusive and exhaustive. For example, if data for one racial/ethnic group are suppressed due to not meeting the minimum N-size of ~~10~~25, then the racial/ethnic group with the second-lowest N-size will be suppressed as well. Measures comprised of fewer than ~~10~~ 25 students are not reported regardless of the result.

14 Consistent with ESEA section1111(i), information collected or disseminated under ESEA section 1111 shall be collected and disseminated in a manner that protects the privacy of individuals consistent with section 444 of the General Education Provisions Act (20 U.S.C. 1232g, commonly known as the "Family Educational Rights and Privacy Act of 1974"). When selecting a minimum N-size for reporting, States should consult the Institute for Education Sciences report "Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information" to identify appropriate statistical disclosure limitation strategies for protecting student privacy.

e. If the State's minimum number of students for purposes of reporting is lower than the minimum number of students for accountability purposes, provide the State's minimum number of students for purposes of reporting.

~~Not applicable. The state's minimum N-size for both reporting and accountability is the same: N = 10.~~ The OSDE believes that the specification of a minimum N for accountability should be driven by the goals of maximizing the inclusion of student groups and minimizing the volatility of school determinations. Further, the OSDE believes that the specification of a minimum N for reporting is intended to support the state's goal of providing meaningful, transparent, and actionable information to the public. Therefore, the OSDE's minimum N for reporting is 10. This allows the state the opportunity to provide the public with as much information as possible while following internal suppression rules protecting student privacy.

iii. Establishment of Long-Term Goals (ESEA section 1111(c) (4)(A)):

a. Academic Achievement. (ESEA section 1111(c)(4)(A) (i)(I)(aa))

1. Describe the long-term goals for improved academic achievement, as measured by proficiency on the annual statewide reading/language arts and mathematics assessments, for all students and for each subgroup of students, including: (i) baseline data; (ii) the timeline for meeting the long-term goals, for which the term must be the same multi-year length of time for all students and for each subgroup of students in the State; and (iii) how the long-term goals are ambitious.

Oklahoma has set long-term goals for all students and for each subgroup of students moving toward proficiency in grade-level standards (i.e., a scale score of 300). Specifically, by 2030 the majority of students – for all students and by subgroup – are expected to achieve proficiency in English language arts (ELA) and mathematics. Oklahoma began administering new, more rigorous assessments in 2017. As such, the state has recalibrated proficiency levels to ensure national comparability. Data from the 2017 test administration was used to establish baseline proficiency levels for all students and by subgroup. As a result of proposed system changes, which include the use of Long-Term Goals and Measures of Interim Progress as part of the Academic Achievement Indicator (as described in the next section)~~)~~, the OSDE has set the baseline for proficiency goals based on performance from the data available from test administrations in the spring of 2018, 2019, and 2021, where appropriate. The inclusion of multiple years of data allows us to have a more robust understanding of student performance. From the baseline, Oklahoma has set yearly proficiency goals through 2030. The rationale for these changes is described in greater detail below.

Long-term goals for students' attainment of proficiency was set at 50% for all students and all subgroups by 2030. A proficiency rate of 50% would put Oklahoma within the top 5-10% of all states. In order to reach 50% proficiency by 2030, subgroup goals must increase by a minimum of 1% each year. Continuous improvement is expected for groups attaining 50% proficiency prior to 2030. Tables detailing the specific yearly goals for all students and by subgroup can be found in Appendix A.

Baseline proficiency rates for grades 3-8 were set using 2017 assessment scores. However, the goals for high school students ~~are hypothetical, as 2018 will be the first administration of new assessments from which baselines will be set and used for the 2018 school report card~~ were hypothetical, with 2018 being used to determine their appropriateness. With the changes being proposed to the state accountability system, long-term goals are being set using a baseline from available and appropriate data from spring 2018, 2019, and 2021 administrations with an aspiration of meeting those goals by 2030. T~~he OSDE intends to submit the updated high school goals once they are set.~~

Due to the recalibration of assessment standards, Oklahoma, like other states, has experienced a significant change in proficiency levels. Interim goals (or measurements of interim progress) have been set at ambitious but attainable steps to reward school improvement toward the long-term goal. Long-term goals and measurements of interim progress were set using the following criteria:

- By 2030, the majority of all students will be expected to achieve proficiency, indicating their readiness for the challenges of college or career (i.e., a scale score of 300); and

- The goals are far enough from the baseline such that each interim goal is both statistically significant and meaningful.

Because some student groups will start at a lower baseline score, the long-term goals will require more progress from lower-performing groups in order to meet the first criteria and close the achievement gap. Continuous improvement will be expected for subgroups that reach their proficiency goal prior to 2030. As such, Oklahoma anticipates reviewing all interim goals to ensure they remain achievable and meaningful. Based on the context in which data were collected (i.e., proposed changes to the system, the loss of the 2019-2020 year of data), the OSDE will recalculate baselines using the three most recent years of data to establish new trajectories against long-term goals. This will ensure that the baseline is meaningful and that targets continue to be achievable yet ambitious.

Achievement gaps will be further illuminated through the use of multiple lenses to provide greater insight into the performance disparities between and among students. In addition to the goals previously described, which reflect the percentage of students attaining proficiency, the OSDE has also set individual scale score targets for students as a measurement of progress toward proficiency. The OSDE uses the term *targets* to refer to scale score thresholds, while the term *goals* represents the percentage of students meeting their specified target and/or proficiency. Targets have been set based on a student's priority student group. While the traditional grouping used for long-term goals places a student in each applicable category, a student's priority group is the only one in which a student is placed.

Based on stakeholder feedback regarding what had been a disproportionate overrepresentation of some individual students within the accountability system, Oklahoma has applied a lesson learned from NCLB and is employing priority student groups in which each student is assigned to one student group based on his or her demographic most strongly correlated with academic achievement. The student group assignment is used specifically to determine an ambitious, yet attainable, scale score target for the student. The expectation for all student groups remains the

same: college and career readiness as demonstrated by proficiency on grade-level standards. Still, the reality of current assessment data demonstrates that gaps remain in achievement. Use of priority grouping has two main purposes:

- To unmask historically underserved students hidden by traditional reporting methods; and

- To champion equity and improvement for all students by ensuring no student counts more than another.

Research on Oklahoma's previous accountability system asserted that "high-scoring, affluent students in [high-performing] schools produce averages that give the appearance of school effectiveness for all, essentially masking the especially low performance of poor and minority children."[15] Assignment of a scale score target based on a student's priority student group assures that every student will receive the focus and attention he or she deserves. Previously, the methodology allowed students from particular backgrounds to be more heavily weighted in the accountability system and created a framework where meaningful differentiation significantly overlapped with the percentage of students in poverty within a school. By contrast, priority student group targets allow each student to contribute equally to the academic indicator. This structure ensures that all students are prioritized and results in an indicator that is not disproportionately identifying high-poverty schools. Priority student groups are assigned to all students based on evidence of a statistically strong relationship to achievement in the following order:

- Students with disabilities;
- Economically disadvantaged students;
- English learners;
- Black/African American students;
- Hispanic/Latino students;
- Native American/American Indian students;
- Asian/Pacific Islander students;
- Students identifying two or more races; and
- White students.

15 Curt M. Adams et al., "Oklahoma School Grades: Hiding 'Poor' Achievement: A-F Report Card," 2013, https://www.okpolicy.org/wp-content/uploads/2013/10/Oklahoma-A-F-Hiding-Poor-Achievement-.pdf.

For more information regarding the validity of this grouping, please see section 4(iv)(a). By including the progress of each priority student group toward rigorous and attainable targets, Oklahoma believes that no individual student will be masked by the performance of an aggregated group. Educators will have information to help accelerate the instruction to groups lagging behind. Low socioeconomic status will no longer be used to explain away or dismiss lower achievement. Oklahoma's innovative accountability system was built to illuminate the academic improvement and achievement of every student, meaning all students will benefit from the information provided by this model.

2. **Provide the measurements of interim progress toward meeting the long-term goals for academic achievement in Appendix A.**

As described in section 4(iii)(a)(1), Oklahoma has set interim goals for all students and subgroups. These measurements of interim progress can be seen in the tables in Appendix A. Additionally, Oklahoma has set interim targets toward proficiency for all students according to priority student group. Similar to the long-term goals, each priority student group has an interim target that is both statistically and meaningfully different from the previous year's target and indicates that the student group is on track to meet Oklahoma's long-term goal of proficiency by 2030 (i.e., a scale score of 300).

To recognize statistically significant movement between interim targets, Oklahoma has used the approximate standard error of measure for state assessment scores, which equals three scale score points, as the minimum growth required for all priority student groups with baselines below proficiency (i.e., a scale score of 300). Tables containing long-term goals and interim student targets for all students can be found in Appendix A. Continuous improvement will be expected for priority student groups that reach their target scale score of 300 prior to 2030. As such, Oklahoma anticipates reviewing all interim goals and targets annually to ensure they remain achievable and meaningful.

3. **Describe how the long-term goals and measurements of interim progress toward the long-term goals for academic achievement take into account the improvement necessary to make significant progress in closing statewide proficiency gaps.**

Oklahoma is committed to the achievement of all students and to narrowing the proficiency gap. By setting long-term proficiency goals that are consistent across subgroups, the state has reaffirmed its commitment to high expectations for all students. While setting ambitious, consistent goals for all students places a focus on gap closure, Oklahoma has gone one step further – truly illuminating and identifying specific disparities.

As described, Oklahoma's traditional grouping methods have often masked trends in student performance. Overlap between subgroups led to justification of lower standards and performance (e.g., assuming that a poor-performing minority student must also be economically disadvantaged), and correlation between subgroups has led to misattributed causation, leaving increases in performance gaps unidentified. An analysis of race/ethnicity – holding all other demographics constant – reveals gaps in performance and bias that were previously hidden.

While analysis of trends at a student-group level have been at the forefront of national research on equity, Oklahoma recognizes that this information has yet to affect accountability at the school, district and state levels. However, viewing achievement through multiple lenses – by priority student group and traditional subgroup – allows Oklahoma greater insight into the performance

disparities between and among students. These gaps can then be leveraged into actionable initiatives to address equity in education. Creating a transparent view of achievement gaps will ensure root causes receive the attention deserved.

b. Graduation Rate. (ESEA section 1111(c)(4)(A)(i)(I)(bb))

1. **Describe the long-term goals for the four-year adjusted cohort graduation rate for all students and for each subgroup of students, including: (i) baseline data; (ii) the timeline for meeting the long-term goals, for which the term must be the same multi-year length of time for all students and for each subgroup of students in the State; and (iii) how the long-term goals are ambitious.**

Oklahoma's long-term goal is to be among the top 10 states for students graduating in the four-, five- and six-year cohorts. The state could reach that goal if 90% of its students graduated. The 2016 baseline graduation rates and intermediate goals for all students and for student groups are shown in Figure 4. The timeline for meeting the long-term goal is 2025. Intermediate goals have been determined for all students and for each student group to show the needed annual increase to meet the long-term goals.

Oklahoma's path to an excellent education for all students includes more rigorous academic content standards, enhanced supports for struggling students and schools and a high school redesign through career pathway planning with greater family collaboration and targeted high school counseling to lead to successful graduates. Oklahoma's current graduation rate of 81.6% should rise as the state follows this course to excellence.

As Oklahoma's graduation rate has declined over the last three years, the OSDE is dedicated to stopping that slide and reversing course. Oklahoma's goal to reach 90% is well above the current national average of 83.2% and has been attained by only two states.[16] These goals are also ambitious but realistic for each student group, with the American Indian student group goal of 90% well above the national average of 70% and the goal for the Black student group at 90% in contrast to the national average of 73%.

16 Common Core of Data: America's Public Schools, "Table 1. Public high school 4-year adjusted cohort graduation rate (ACGR), by race/ethnicity and selected demographics for the United States, the 50 states, and the District of Columbia: School year 2014–15," National Center for Education Statistics, Sept. 15, 2016.

2. **If applicable, describe the long-term goals for each extended-year adjusted cohort graduation rate, including (i) baseline data; (ii) the timeline for meeting the long-term goals, for which the term must be the same multi-year length of time for all students and for each subgroup of students in the State; (iii) how the long-term goals are ambitious; and (iv) how the**

long-term goals are more rigorous than the long-term goal set for the four-year adjusted cohort graduation rate.

Oklahoma ~~will establish~~ established long-term goals for graduation rates that include five- and six-year graduates. The state will examine the baseline data and establish ambitious intermediate goals ~~when~~ for the extended-year graduation ~~information is available in March 2018~~rates. Oklahoma ~~will~~ incorporated five-year graduation rates for the first time in the 2017-18 report card and included six-year graduation rates for the first time in the 2018-19 report card. ~~Once baseline data are collected and reviewed~~ Baseline data, including the 2018-2019 data, were used to set the five- and six-year graduation rates. ~~, goals will be set for five- and six-year graduation rates.~~ At a minimum, the long-term and intermediate goals for the five-year extended cohort graduation rate will be measurably higher than those for the four-year cohort graduation rate. Likewise, the long-term and intermediate goals for the six-year extended cohort graduation rate will be measurably higher than the goals for the five-year extended cohort graduation rate. These baselines, long-term goals, and measures of interim progress are presented in Appendix A.

3. **Provide the measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate in Appendix A.**

Ambitious interim targets have been set for the four-year and extended-year adjusted cohort graduation rates. The targets are set for each student group so that if the targets are reached, the group will meet the long-term goal of 90% graduation rate by 2025. Similarly, targets ~~will be~~ were set for the five- and six-year adjusted cohort graduation rates for each student group (see Appendix A).

4. **Describe how the long-term goals and measurements of interim progress for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate take into account the improvement necessary to make significant progress in closing statewide graduation rate gaps.**

The interim targets have been determined by the progress that each student group must make to reach a 90% graduation rate. Student groups with lower graduation rates in ~~2016~~ 2019 will have to make more progress annually to reach their target than student groups with higher ~~2016~~ 2019 graduation rates. These differences are illustrated in the trajectories identified for each student subgroup in Appendix A. ~~For example, there is a 6% gap between black and white students. Therefore, the black student subgroup will have to grow at a rate of 1.4% annually, compared to 0.8% annually for the White student subgroup to meet the interim goals. Annual progress toward reaching the graduation rate targets will be monitored to ensure that graduation rate gaps are closing.~~

c. English Language Proficiency. (ESEA section 1111(c)(4)(A) (ii))

1. Describe the long-term goals for English learners for increases in the percentage of such students making progress in achieving English language proficiency, as measured by the statewide English language proficiency assessment including: (i) baseline data; (ii) the State-determined timeline for such students to achieve English language proficiency; and (iii) how the long-term goals are ambitious.

Through the recommendation of the Assessment and Accountability Task Force, in collaboration with Gary Cook, Ph.D., esteemed WIDA scholar, Oklahoma's ambitious long-term goal for English learners (ELs) is to achieve an increase of the ~~16 point increase in the~~ percentage of students on track to English proficiency by 2025 of 66%, however, the trajectory for the measures of interim progress needs to be updated as a result of empirical and procedural review. ~~Using a baseline of 50% of English learners on-track to proficiency – based on 2014-15 WIDA ACCESS for ELLs 1.0 scores and a 2% rate of growth – 66% of English learners are expected to be on track to proficiency in 2025. This baseline is expected to change as a result of potential new cut scores.~~

The OSDE has improved the processes and procedures for identifying English Learners, which includes the grade level when first enrolled and the number of years in the country. However, this process will not be finalized until SY 2021-2022. Therefore, the baseline for the EL progress Long-Term Goal will be based on the average percentage of English Learners on track to be proficient in SY 2020-2021 and SY 2021-2022, with a target of 66% of English Learners expected to be on track to be proficient in 2030. This target is the same as the previously approved state plan, but reflects a more aggressive timeline to meet those goals.

Students should be able to exit an English language development program within five years at most, depending on their starting point (established by their first proficiency assessment). This approach assumes that a year of learning should result in a minimum level (e.g., one performance level) of growth on either the WIDA ACCESS for ELLs 2.0 or Alternate ACCESS, the English learner proficiency assessment (ELPA).

Each student will have a specific trajectory for growth resulting in annual English language proficiency (ELP) growth targets. The specific scale score growth target for each student will depend on the student's grade level and proficiency level – based on the ELPA – upon entering Oklahoma public schools. Each year, the student's ELP progress will be measured against their customized growth target for that year. It is expected that all English learners ultimately will achieve proficiency according to their trajectory relative to the grade level and ELP upon initial assessment.

For example, a third-grade student who scores a proficiency level of 1 will have five years to exit the program, while a third-grade student who enters with a proficiency level of 3 will have three years to do so. This approach, simulated in Figure 4 of Appendix A, reflects research that indicates English learners generally require four to seven years to develop academic language proficiency in English to be academically successful.[17]

WIDA ACCESS for ELLs 2.0 has a new level of rigor designed to ensure it is an accurate assessment of students' ELP as it relates to their being college and career ready. The assessment recently has gone through a standard-setting adjustment that will apply to the 2017 administration. Furthermore, improvement's in OSDE's processes and procedures in SYs 2019-2020 and 2020-2021 improving student identification required that the state ~~Therefore, long-term and interim goals will need to be recalculated once new baseline data is available~~revisit long-term and interim goals once data are available. ~~The state will use a similar methodology as long-term and interim goals for academic achievement.~~ Because these goals will be expressed as the percentage of students on track to reaching English language proficiency, two years of data ~~will be required~~ are required to establish challenging and attainable goals. With this model, the state will develop a trajectory for every student to be on track toward meeting proficiency using data from SYs 2020-2021 and 2021-2022.

English learners will be included in both the ELPA calculations and the EL student group for other accountability indicators for four years after exiting EL services. A description of how this indicator is included in the overall accountability system is included in section 4(v) of the State Plan.

17 H. Gary Cook, Timothy Boals and Tod Lundburg, "Academic Achievement for English Learners: What Can We Reasonably Expect?" *Phi Delta Kappan* Vol. 93, No. 3 (Nov. 1, 2011): 66-69.

2. Provide the measurements of interim progress toward the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency in Appendix A.

Oklahoma will develop interim goals or targets that reflect the true trajectory of language development for English learners. Each year the student's ELP progress will be measured against his or her customized growth target for that year. Interim targets will be developed based on the assumption that a year of learning should result in one scale score level of growth on the ELPA. The specific scale score growth target will depend on the student's grade level and proficiency level – based on the ELPA – upon entering Oklahoma public schools, as demonstrated in Appendix A.

WIDA ACCESS 2.0 has new content standards and recently has gone through a standard-setting adjustment that ~~will apply~~ applied to the 2017 administration. Furthermore, the improvements in OSDE's EL identification processes and procedures required the state to revise ~~Revised~~ student ELP interim goals. Data from SYs 2019-2020 and 2020-2021 will be used as a baseline to set an ambitious goal that the ~~will be established once new data are available that can be used as a baseline. Oklahoma has set an ambitious goal that the~~ percentage of students exiting the English learner program will incrementally increase to ~~increase at a rate of two percent per year from 50% to~~ 66% ~~. This represents a 16% increase between 2017 and 2025.~~ by 2030.

iv. Indicators (ESEA section 1111(c)(4)(B))

a. Academic Achievement Indicator. Describe the Academic Achievement indicator, including a description of how the indicator (i) is based on the long-term goals; (ii) is measured by proficiency on the annual Statewide reading/language arts and

mathematics assessments; (iii) annually measures academic achievement for all students and separately for each subgroup of students; and (iv) at the State's discretion, for each public high school in the State, includes a measure of student growth, as measured by the annual Statewide reading/language arts and mathematics assessments.

INSERT FIGURE 5 ABOUT HERE

ENGLISH LANGUAGE ARTS AND MATH ACADEMIC ACHIEVEMENT INDICATOR

Oklahoma is committed to supporting all students, especially those in historically underserved student groups. Oklahoma's innovative accountability system was built to illuminate the academic improvement and achievement of every student, meaning all students will benefit from the information provided. Indicators for Oklahoma's accountability system are listed in Figure 5.

All schools will have academic indicators for English language arts (ELA) and mathematics achievement. In grades 3-8, these indicators will be based on performance on the state assessment in the most recent school year. In high school, both ELA and mathematics achievement will be based on performance on the college- and career-ready assessments in the most recent school year. As a reminder, Oklahoma's long-term goal is that the majority of students attain proficiency by 2030. ~~Using baseline data from 2017~~ Using baseline data from 2018, 2019, and 2021, the median percent proficient will be updated based on spring 2021 administration. ~~, the median percent proficient was determined by subject area and grade~~. Interim proficiency goals were set using criteria outlined in section 4(iii)(a)(1) of the State Plan, to ensure continuous improvement toward proficiency for all students and subgroups. Oklahoma will report the percentage of all students attaining proficiency by both performance level and grade level. Tables demonstrating the measurements of interim progress and long-term proficiency goals can be found in Appendix A.

The OSDE uses the term *goals* to represent the percentage of students meeting their specified target and/or proficiency, while the term *targets* refers to scale score thresholds. Targets have been set based on ambitious and achievable progress from the baseline, with the end goal of all students meeting a target indicating grade-level proficiency. Achievement targets will be measured in terms of scale scores with a scale score of 300 representing proficiency. Schools will receive points for the academic achievement indicator based on the percentage of students reaching proficiency and the total points earned by students achieving their scale score target.

Based on stakeholder feedback regarding the over-representation of some individual students within the accountability system, Oklahoma has applied a lesson learned from NCLB and is employing priority student groups, where each student is assigned to one student group based on his or her demographic most strongly correlated with academic achievement. The expectation for all student groups remains the same: college and career readiness as demonstrated by proficiency on grade-level standards. Still, the reality of current assessment data demonstrates that gaps remain in achievement.

Use of priority grouping has two main purposes:

- To unmask historically underserved students hidden by traditional reporting methods; and
- To champion equity and improvement for all students by ensuring no student counts more than another.

While analysis of trends at a student-group level has been at the forefront of national research on equity, Oklahoma recognizes that this information has yet to affect accountability at the school, district and state levels. Research on Oklahoma's previous accountability system asserted that "high-scoring, affluent students in [high-performing] schools produce averages that give the appearance of school effectiveness for all, essentially masking the especially low performance of poor and minority children."[18] In an effort to unmask the performance of all students and to ensure that no trends in student performance go unidentified, each student will be assigned only one student group for purposes of calculating points for the academic achievement indicator. As such, the incentive to focus on some students over others will be significantly decreased. Instead, all students will be a priority, regardless of proficiency.

18 Curt M. Adams et al., "Oklahoma School Grades: Hiding 'Poor' Achievement: A-F Report Card," 2013, https://www.okpolicy.org/wp-content/uploads/2013/10/Oklahoma-A-F-Hiding-Poor-Achievement-.pdf.

To ensure transparency and accessibility for educators and the public, Oklahoma has chosen to focus on priority groups as the means to ensure all students contribute equally. This structure allows each student to have one academic target by subject, as opposed to multiple targets, depending on his or her demographics. By including priority student grouping in the accountability system, Oklahomans will have greater access to examine the disparities previously mastered in traditional subgrouping processes. Additionally, the OSDE will be able to leverage priority student group developments into actionable initiatives addressing equity in education.

Priority student groups are assigned to all students based on evidence of a statistically strong relationship to achievement. The student groupings used for this indicator are as follows:

- Students with disabilities;
- Economically disadvantaged students;
- English learners;
- Black/African American students;
- Hispanic/Latino students;
- Native American/American Indian students;
- Asian/Pacific Islander students;
- Students identifying two or more races; and
- White students.

To validate this grouping, the OSDE ran multiple statistical analyses using 2016-17 demographic and assessment data. Separate analyses were conducted for each grade level (3-8) for both English language arts and math. In all 12 analyses, the strongest predictor of academic achievement was whether a student had a reported disability.

Further, the U.S. Supreme Court recently held that the Individualized Education Program of a student with a disability must be "reasonably calculated to enable the child to make progress appropriate in light of the child's circumstances."[19] In its holding, the Court additionally emphasized the requirement that "every child should have the chance to meet challenging objectives." As such, and because of the strong correlation between academic achievement and students with disabilities, Oklahoma has elected to place this grouping first.

In 11 of the 12 analyses, the second-strongest predictor was whether a student was economically disadvantaged (it was third-strongest in the 12th analysis). The groups with the next two strongest relationships were English learners and Black/African American students. Although Black/African American students had the third-strongest relationship with achievement in several of the analyses, the OSDE determined it appropriate and valid to prioritize service eligibility (i.e., EL services, IEP services or meal assistance) in achievement predictors. Furthermore, only 1.1% of the 30,722 English learners included in the analysis also identified as Black or African American, and only 1.2% of students identifying as Black or African American were also English learners. These data imply that, after accounting for students with disabilities and students who are economically disadvantaged, the remaining groups are essentially mutually exclusive. For detailed information on the statistical models, please see Appendix A.

As a reminder, this grouping methodology will be used only for purposes of calculating the points a school will receive on the academic achievement indicator. By including the progress of each priority student group toward rigorous and attainable targets, Oklahoma believes that no individual student will be masked by the performance of an aggregated group. Educators will have information to help accelerate instruction to groups lagging behind, and low socioeconomic status will no longer be used to explain away or dismiss lower achievement.

The academic achievement indicator represents (1) the extent to which all students within a school are meeting their targets as determined by grade level and priority student group as they progress toward proficiency and (2) the Performance Level Snapshot of the All Students group. The OSDE uses an indexing system to assign points earned under this indicator based on the student's target scale score. Students who meet their scale score target but are not yet proficient receive 0.95 points, whereas a proficient student would earn 1.0 point ~~and an advanced student would earn 1.25 points~~.

Total points earned under this indicator are based on the two categories named in the previous paragraph: ~~priority student group performance and performance of the All Students group~~ Priority student group Improvement Toward Expectations (ITE) will contribute 7.5 points and the Performance Level Snapshot will provide 7.5 points each for ELA and math (for a total of 30 points). As a result of comprehensive empirical analyses, it was concluded that the overweighting of the priority student group portion of the academic achievement indicator limited the system's ability to detect improvement with sufficient sensitivity. Thus, the academic achievement indicator is being

weighted across these two components to more clearly communicate expectations for overall school performance and student group performance.~~.~~ ~~Priority student group performance will contribute 14 points each for ELA and math.~~

For the Priority Student Group ITEs, the OSDE will award points based on the indexing system described above where points are awarded based on performance against a priority student group's trajectory, which differs by grade and content area. Students who meet their scale score target but are not yet proficient will receive 0.95 points, whereas students who meet their target and are proficient will earn 1.0 point.

~~These points will be students meeting their scale score targets. Additionally, one point will be possible each for ELA and math based on the All Students group performance.~~

~~The percentage of students~~For the Performance Level Snapshot, the OSDE will award points based on the proportion of students who meet certain performance levels. Performance will be based on the percentage of students at the performance levels of basic, proficient, and advanced and will earn .5, 1.0, and 1.25 points, respectively. Student who perform at the Below Basic level will earn 0 points.

~~attaining proficiency will be multiplied by 1 to determine points earned (e.g., 78% proficiency would equal 0.78 points).~~ The points earned for both priority student group ITEs performance and the ~~All Students group performance~~ Performance Level Snapshot will be summed to determine an overall score out of 15 points for ELA and 15 points math for a total possible score of 30 points for the Academic Achievement Indicator.

The school report card rubric ~~will not be finalized~~ is being revised ~~until all the~~ now that all indicators have been calculated and reviewed. ~~However, below is a sample rubric for academic achievement in ELA and math derived using preliminary 2017 academic achievement data to estimate scores on this indicator for elementary and middle schools (30 points total for ELA and math achievement).~~ The ~~sample ranges for the~~ indicator's letter grade ~~were set to the school score at approximately the 90th, 65th, 30th and 5th percentiles respectively.~~ will be set using a criterion-reference standard setting process, which is described in greater detail in our appendices document. The Academic Achievement Indicator breakdown is presented in the table below.

Academic Achievement Indicator (30 Points)			
Priority Student Group Improvement Toward Expectations (15 points: 7.5 pts for ELA, 7.5 pts for math)		Performance Level Snapshot (15 points: 7.5 pts for ELA, 7.5 pts for math)	
Below Target	0 pts	Below Basic	0 pts
Above Target but not Proficient	.95 pts	Basic	.5 pts
Above Target and Proficient	1 pt	Proficient	1 pts
		Advanced	1.25 pts

~~ELA and Math Academic Achievement (30 points)~~
~~A: 25.70 - 30.00~~
~~B: 21.63 - 25.69~~

~~C: 17.69 - 21.62~~
~~D: 11.25 - 17.68~~
~~F: 0 - 11.24~~

Data on academic achievement will also be disaggregated and reported by subgroups using the traditional grouping methodology to compare student performance with long-term and interim goals. Here, the Hispanic/Latino subgroup would demonstrate the extent to which all Hispanic/Latino students are meeting their individual student target; noting that the target may differ by student based on his or her priority student group. To reiterate, Oklahoma is using traditional subgroups to measure and report student performance in ELA and math. Based on stakeholder feedback, and the innovation required to support Oklahoma students equitably, each student contributes equally to this indicator based on one scale score target determined by the student's demographic most closely aligned with academic achievement (his or her priority student group).

As a result, Oklahoma will employ an innovative approach that reports student achievement two ways: utilizing priority student groups to set ambitious, achievable, student-level targets for the academic achievement indicator (as previously described) and utilizing traditional subgroup methods for both reporting of student performance, Additional Targeted Support and Improvement (ATSI), -and Targeted Support and Improvement (TSI) designations. For TSI and ATSI identification, the academic achievement of each subgroup will be calculated so that a student is represented in every group to which he or she belongs in order to identify any consistently underperforming groups of students and the lowest performing subgroups. This calculation allows Oklahoma to recognize trends both at the subgroup and student group level, to ensure that disparities and gaps are appropriately identified. Oklahoma will use both the priority student grouping and traditional subgrouping methodologies to differentiate and identify school success and improvement for all students and by subgroup.

These two methodologies provide an innovative approach that allows Oklahoma to examine student data through multiple lenses, illuminating multiple perspectives of student performance and providing a more complete narrative, especially for traditionally underserved students. By identifying schools for TSI and ATSI through the traditional subgroups and using the priority student groups to determine measurements of interim progress, Oklahoma ensures that schools are held accountable for students from historically underserved racial/ethnic student groups.

SCIENCE ACADEMIC ACHIEVEMENT INDICATOR

In addition to the ELA and math academic achievement indicator, Oklahoma has included a science achievement indicator in its accountability system after strong recommendations from the Assessment and Accountability Task Force and legislation signed into law by the governor.[20] In 2014, Oklahoma adopted three-dimensional academic standards for science that were informed by A Framework for K-12 Science Education by the National Research Council.[21] As a result, the Oklahoma standards reflect a highly informed, state-based effort to improve science instruction and student outcomes in Oklahoma.

As one of the first states to adopt three-dimensional standards, Oklahoma leads nationally in collaborations to develop the next generation of assessments and instructional resources. All of Oklahoma's state-level science assessments are three-dimensional, as required by the new standards. These dimensions are intentionally used to replicate real-world applications and methods of science. As such, practices that are traditionally under the umbrella of ELA and mathematics are intentionally incorporated. This purposeful inclusion begins in kindergarten and progressively develops as students advance in their education through high school. Oklahoma's science standards reinforce ELA and mathematical skills through practical application as students implement scientific practices while learning. Also factoring into this decision is the fact that five of Oklahoma's nine primary wealth-generating ecosystems include STEM-related fields: aerospace and defense, agriculture and bioscience, energy, information services and health care.

20 For purposes of federal accountability, the science indicator will be an Other Academic Indicator for elementary and middle schools and a School Quality Student Success Indicator in high school.

21 *A Framework for K-12 Science Education: Practices, Crosscutting Concepts and Core Ideas* (Washington, DC: The National Academies Press, 2012).

As a result of this integration among the subjects and the state's intense focus on developing these skills in its students, Oklahoma has gone above and beyond the requirements of law to include science in its accountability system as an additional achievement indicator.

The science achievement indicator represents the extent to which students within a school are meeting their targets determined by grade level and priority student group as they progress toward proficiency in science. The OSDE uses the same indexing system as that for ELA and math to assign points earned under this indicator based on the student's target scale score. Students who meet their scale score target but are not yet proficient receive 0.95 points, whereas a proficient student would earn 1.0 point~~s and an advanced student would earn 1.25 points~~.

Identical to the point calculation for ELA and math achievement, points may be earned under two categories: priority student group ITE ~~performance~~ and Performance Level Snapshot ~~performance~~ of the All Students group. For high schools, Priority student group Improvement Toward Expectations (ITE) will contribute 7.5 points and the Performance Level Snapshot will provide 7.5 points each for science (for a total of 15 points). This science indicator (which is part of the School Quality, Student Success Indicator) is being weighted across these two components to more clearly communicate expectations for overall school performance and student group performance.

For the science Priority Student Group ITEs, the OSDE will award points based on an indexing system where points are awarded based on performance against a priority student group's trajectory. For the Performance Level Snapshot, the OSDE will award points based on the proportion of students who meet certain performance levels. This breakdown is presented in the table below.

Science Indicator (15 Points)			
Priority Student Group Improvement Toward Expectations (7.5 pts)		Performance Level Snapshot (7.5 pts)	
Below Target	0 pts	Below Basic	0 pts
Above Target but not Proficient	.95 pts	Basic	.5 pts
Above Target and Proficient	1 pt	Proficient	1 pts
		Advanced	1.25 pts

~~14 points are possible based on the points earned under the indexing system described previously. One point is possible for performance of the All Students group in relation to the percentage of students attaining proficiency (e.g., 78% proficiency would equal 0.78 points).~~ The total points will be summed to determine an overall score out of 15 points possible for science for high schools. For elementary schools, this weight is decreased as there are a greater number of assessments available to include in the system.

As mentioned previously, science assessments are administered only once each in elementary and middle school. As such, the proportion of points possible for priority student group performance and performance of the All Student group is maintained by assigning ~~4.67~~ 2.5 points possible for priority student group performance, and ~~0.33~~ 2.5 points possible for performance of the All Students group. The total points will be summed to determine an overall score out of 5 possible points for science for elementary and middle schools.

PARTICIPATION

Oklahoma will incorporate assessment participation in its academic achievement indicator in compliance with ESEA section 1111(c)(4)(E). The numerator will be the total points earned by all full academic year (FAY) students tested. The denominator will be the greater of the following: all FAY students tested or the minimum number that represents at least 95% of all FAY students and at least 95% of each subgroup that meets the minimum N-size.

b. Indicator for Public Elementary and Secondary Schools that are Not High Schools (Other Academic Indicator). Describe the Other Academic indicator, including how it annually measures the performance for all students and separately for each subgroup of students. If the Other Academic indicator is not a measure of student growth, the description must include a demonstration that the indicator is a valid and reliable statewide academic indicator that allows for meaningful differentiation in school performance.

For elementary and middle schools, the other academic indicator is growth. Each student receives a growth score, which can then be averaged across schools or districts. Growth measures a student's achievement in fourth grade in 2018 compared to third grade in 2017, for example.

For grades 3-8 in ELA and mathematics, a score is given annually. Thus, growth can be measured at the student level between grades 3-4, 4-5, 5-6, 6-7 and 7-8. A K-5 school will have two grade levels included in the growth measure per subject, and a middle school with grades 6–8 will have three grade levels included in the growth measure.

The state will use a value table to measure growth.[22] Schools will be given credit for growth across the entire scale. Each achievement level will be divided in half so that growth is measured within as well as across levels. By giving credit for moving a student from a low unsatisfactory to a high unsatisfactory, this indicator will provide different information about schools than the academic achievement indicator. Background research on the value table model and sample value tables may be reviewed in Appendix 7: Assessment Requirements (pages 149-150). As outlined in Appendix 7, Oklahoma will not have data to determine the best value table for the growth measure until September 2018 because new standards and new assessments were implemented in 2017, and at least two years of data must be collected before final decisions are possible. The final value tables will be available to calculate the indicator in time to make school determinations for the 2018-19 school year and be included in the 2018 school report card.

22 David Griffith, "Touchdown, Colorado! A School Rating System That Gets the Basics Right," *Flypaper*, March 29, 2017, https://edexcellence.net/articles/touchdown-colorado-a-school-rating-system-that-gets-the-basics-right.

In addition to using the growth score of all students for the growth indicator, the OSDE will disaggregate growth data by traditional subgroups. Oklahoma believes that all students can grow and all schools can improve. Increasing student achievement for all students will require increasing achievement at faster rates for those students who are furthest behind. The state will use accountability data gathered from traditional student groups to ensure that all students are college and career ready and to close achievement gaps of historically underserved student groups.

c. Graduation Rate. Describe the Graduation Rate indicator, including a description of (i) how the indicator is based on the long-term goals; (ii) how the indicator annually measures graduation rate for all students and separately for each subgroup of students; (iii) how the indicator is based on the four-year adjusted cohort graduation rate; (iv) if the State, at its discretion, also includes one or more extended-year adjusted cohort graduation rates, how the four-year adjusted cohort graduation rate is combined with that rate or rates within the indicator; and (v) if applicable, how the State includes in its four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rates students with the most significant cognitive disabilities assessed using an alternate assessment aligned to alternate academic achievement standards under ESEA section 1111(b) (2)(D) and awarded a State-defined alternate diploma under ESEA section 8101(23) and (25).

The graduation rate indicator is directly connected to Oklahoma's long-term goal to be among the top 10 states for students graduating in the four-, five- and six-year cohorts. The state could reach that goal if 90% of its students graduated. Within the accountability system, both for the A-F Report Card and for designations of Comprehensive Support and Improvement (CSI) and Targeted Support

and Improvement (TSI), the OSDE will continue to use the valid and reliable federal four-year cohort graduation rate formula. This calculation will be consistent for high schools in all districts across the state and will be disaggregated for each ESSA student group.

The four-year graduation rate is defined by the USDE in 34 CFR §200.18(b)(i)(A) and 70 O.S. §3-151.1 as "the number of students who graduate in four years with a regular high school diploma divided by the number of students who form the adjusted cohort for that graduating class" (i.e., entered high school four years earlier, adjusting for transfers in and out, émigrés and deceased students). In other words, students will be assigned to a cohort based on the year they are expected to graduate on a four-year plan. For example, students entering the ninth grade in the 2013-14 school year would be assigned to the 2017 cohort. The four-year graduation rate will then be calculated using the following formula depicted in Figure 6.

~~The graduation rate indicator is based on two metrics: the four-year graduation rate metric and the school graduation improvement metric. The four-year graduation rate metric uses the four-year adjusted cohort graduation rate as defined by ESEA section 8101(25)(A). Further, the graduation rate indicator will utilize the most recently finalized cohort, meaning the data used will be a year in arrears to account for summer graduates. For example, for accountability determinations released in fall 2018, the graduation rate indicator will utilize the 2017 cohort for the four-year graduation rate metric depicted in Figure 6.~~

~~Graduation Rate Indicator Weights (30 points of the total High School System)~~	
~~4-year ACGR~~	~~5 points (or 50% of the indicator)~~
~~5-year ACGR~~	~~3 points (or 30% of the indicator)~~
~~6-year ACGR~~	~~2 points (or 20% of the indicator)~~

~~The school graduation improvement metric considers how many more students the school was able to graduate following the cohort year. For 2018, this metric will compare five-year cohort graduation rates with the previous year's four-year cohort graduation rate, depicted in Figure 6.~~
Oklahoma significantly increased its graduation data quality beginning in 2016 and plans to incorporate the six-year graduation improvement score using a similar method beginning in 2019.

~~The five-year graduation improvement score is based on the difference between a five-year adjusted cohort graduation rate and the four-year adjusted cohort graduation rate for the same cohort. The improvement score is used to identify additional students who graduated, and points are awarded based on this difference. For example, if a school's four-year graduation rate for the previous year was 80.0 percent and its five-year graduation rate for the same cohort of students was 88 percent, then the school could receive 8 points for a five-year graduation rate improvement score (88.0 percent – 80.0 percent = 8.0 points).~~

~~To reiterate, the five-year graduation rate improvement score utilizes a different cohort from the four-year graduation rate score. The four-year graduation rate score will utilize the most recently finalized graduation cohort only. The school graduation improvement score will utilize five-year graduation rates and the four-year graduation rate from the same cohorts of students.~~

For accountability determinations released in fall 2018, the following example data ~~will~~ would be used:

- Four-year graduation rate score using the 2017 four-year cohort graduation rate and the five- and six-year ACGRs; and

- ~~Five-year graduation rate improvement score.~~ The four-, five-, and six-year ACGRs will make up 10 points of the overall system with the four-, five-, and six-year ACGRs comprising 5, 3, and 2 points, respectively.

~~Figure 6 is no longer necessary~~

The graduation rate indicator is weighted across the 4-year, 5-year, and 6-year ACGRs as indicated in the table below.

Graduation Rate Indicator Weights (10 points of the total High School System)	
4-year ACGR	5 points (or 50% of the indicator)
5-year ACGR	3 points (or 30% of the indicator)
6-year ACGR	2 points (or 20% of the indicator)

~~The four-year graduation rate score and the school graduation improvement score will be combined to yield the overall graduation rate indicator score. Points are assigned based on the total graduation rate indicator score divided by 10 and rounded to one decimal place. A sample rubric can be found below. The rubric will be finalized after data have been reviewed and analyzed prior to the 2018-19 school year.~~

~~Sample Rubric for Graduation Rate (10 points)~~
~~A: 9.0 -10.0~~
~~B: 8.0 – 8.9~~
~~C: 7.0 – 7.9~~
~~D: 6.0 – 6.9~~
~~F: 0.0 – 5.9~~

d. Progress in Achieving English Language Proficiency (ELP) Indicator. Describe the Progress in Achieving ELP indicator, including the State's definition of ELP, as measured by the State ELP assessment.

The OSDE's current long-term goal is to work toward yearly significant increases in the percentage of students achieving proficiency, as measured by the state-approved English learner Proficiency Assessment (ELPA) – the WIDA ACCESS for ELLs 2.0 – and ceasing to require EL services within a maximum of five years. While the proposed long-term goal is that 66% of ~~currently 50% of~~ English

learners are on track to proficiency by 2030, ~~with a goal of growing at 2% each year,~~ the OSDE anticipates ~~establishing~~ reviewing ~~new specific, percentage-based~~ long-term and interim progress goals annually. ~~once b~~Due to improvements in OSDE's EL identification processes and procedures, baselines are being set using the data from SYs 2019-2020 and 2020-2021. ~~data is available from the 2017 and 2018 administration of the WIDA ACCESS 2.0 to be included in the 2018 school report card.~~

Under Oklahoma's definition of English language proficiency, an English learner who is proficient in English can:

- Meet proficiency on state assessments;
- Successfully achieve in classrooms where the language of instruction is English; and
- Be on track to meet Oklahoma's college-and career-ready standards.

In November 2017, Oklahoma convened an EL district stakeholder committee to set a new cut score for the new English language placement test, WIDA Screener, as well as a new English language proficiency band for the ELPA, ACCESS for ELLs 2.0. While Oklahoma is committed to setting challenging and ambitious standards for its English learners, these new factors warranted conducting a comparison study using data from both EL performance on OSTP assessments and on the ACCESS for ELLs 2.0 with the updated scoring standards. This comparison allowed Oklahoma to establish at what ELP level EL scores correlate to scoring proficient on state content-area assessments in percentages commensurate with non-EL grade-level peers. These comparison data helped to inform Oklahoma's selection of both new placement criteria for the WIDA Screener and new exit criteria on the ACCESS for ELLs 2.0 assessment. This target band will inform Oklahoma's setting of interim progress goals for attaining ELP, ensuring that they are ambitious but attainable. EL growth targets focused on English proficiency as measured by the ELP assessment will be set and based on data from the 2017-18 school year.

The ELP indicator will examine whether students have met or exceeded their expected growth for an on-time program exit. Generally speaking, students entering at a level 1 have five years to exit level 2 four years to exit, level 3 three years to exit, and so on. Growth will be determined using scale scores.

Consistent with the methodology used for the academic achievement indicator, each English learner will have a "target" or expected growth value for the subsequent year. Should the student meet or exceed the growth required for an on-time exit, the student would earn one point. If the actual growth is less than expected, the student would receive no points under this indicator. This calculation requires redefining the expected growth target each year since it is based on both grade level and proficiency level.

The overall score on this indicator will be indexed based on the percentage of English learners earning points (by meeting/ exceeding the target or exiting services). Schools with the highest percentage of English learners earning points will receive the highest scores on this indicator.

For example, if a school has ~~10~~ 30 enrolled English learners, and ~~eight~~ 24 students meet their growth target, the school would receive 80% of the available points (~~12~~ 8points out of ~~15~~10). The OSDE will use data from the 2017 WIDA ACCESS, coupled with the 2018 WIDA ACCESS data – which will be available in summer 2018 – to complete these calculations. Using these data will allow the OSDE to calculate the indicator in time to make school determinations for the 2018- 19 school year and be included in the 2018 school report card.

e. School Quality or Student Success Indicator(s). Describe each School Quality or Student Success Indicator, including, for each such indicator: (i) how it allows for meaningful differentiation in school performance; (ii) that it is valid, reliable, comparable, and statewide (for the grade span(s) to which it applies); and (iii) of how each such indicator annually measures performance for all students and separately for each subgroup of students. For any School Quality or Student Success indicator that does not apply to all grade spans, the description must include the grade spans to which it does apply.

Because absenteeism represents lost instructional time, whether excused or not, and has a strong relationship with achievement and graduation, Oklahoma will use chronic absenteeism as a School Quality Indicator. Absenteeism further serves as an early warning system relevant to all grades and considered an important metric in accountability. Research shows that students who are chronically absent in sixth grade are much less likely to graduate high school on time, if at all.[23] Similarly, chronic absence in kindergarten was associated with lower academic performance in first grade.[24]

The Hamilton Project at the Brookings Institution released a report recommending states adopt chronic absenteeism as the "fifth indicator" of student success and school quality.[25] A compelling aspect of school quality is linked to building a culture around regular school attendance. School culture is a combination of many factors that are within the control of school personnel: school environment, expectations, staff attitudes toward students, communication with families and safety in the school building. The important integral component of the chronic absenteeism metric is that schools recognize that the chronic absenteeism numbers are meaningless unless they are used to drill down to individual student stories. Reviewing these student stories can then help uncover underlying causes for chronic absenteeism, like bullying, ineffective school discipline, in-school or out-of-school trauma, an undiagnosed disability or few meaningful relationships with adults at school. Identifying root causes can then begin the conversation on how to use what is within the control of the school to address these root causes and decrease the number of students chronically absent.

For all schools Oklahoma will use chronic absenteeism, defined as missing 10% or more of the school year, reflecting the general definition recognized in the Johns Hopkins University School of Education Researchers report. ~~Therefore~~For example, for a student enrolled for a full academic year defined as 180 instructional days, missing 10% of the school year would result in missing 18 days, or almost a full month of instruction.

23 Baltimore Education Research Consortium, "Destination Graduation: Sixth Grade Early Warning Indicators for Baltimore City Schools: TheirPrevalence and Impact," Feb. 2011, http://baltimore-berc.org/pdfs/SixthGradeEWIFullReport.pdf.

24 Robert Balfanz and Vaughan Byrnes, "The Importance of Being in School: A Report on Absenteeism in the Nation's Public Schools," Johns Hopkins University School of Education Center for Social Organization of Schools, May 2012.

25 Diane Whitmore Schanzenbach, Lauren Bauer and Megan Mumford, "Lessons for Broadening School Accountability Under the Every StudentSucceeds Act," Brookings, Oct. 28, 2016, https://www.brookings.edu/wp-content/uploads/2016/10/es_20161027_chronic_absenteeism.pdf.

All students enrolled in school for a full academic year should be included in this indicator for that school year. The OSDE will report chronic absenteeism rates for all students and separately for each subgroup.

The OSDE will calculate points earned under this indicator by multiplying the percentage of not chronically absent students at a site by the available points (10 points for all schools). Thus, a school with 25% of students identified as chronically absent would earn 7.5 points, whereas a school with 35% of students chronically absent would earn only 6.5 points.

This measure differentiates schools and in fact differentiates schools with much greater success than an aggregate attendance rate. Based on self-reported data from districts for the semi-annual required report to the Office of Civil Rights as reported by the Hamilton Project, 17.6% of Oklahoma schools have no students who are chronically absent. Oklahoma's current rates of chronic absenteeism include:

- 11.7 percent overall
- 16.1 percent for high schools
- 11.7 percent for middle schools
- 9.5 percent for elementary schools

As a school quality/student access indicator for high schools, the OSDE will also use postsecondary opportunities with a focus on participation. The document, "Identifying a School Quality/Student Success Indicator for ESSA: Requirements and Considerations," emphasizes the primary unit of measurement for a student success indicator must be the student: "Student participation in advanced coursework allows for sub-group disaggregation if defined in terms of the number/percentage of students taking advanced courses in a given school."[26]

26 Erika Hall, "Identifying a School Quality/Student Success Indicator for ESSA: Requirements and Considerations," The National Center for the Improvement of Educational Assessment, Inc./CCSSO, Jan. 2017, http://ccsso.org/Documents/2017/ESSA/CCSSOIdentifyingSchoolQualityStudentSuccessIndicator1242017.pdf.

Schools will receive credit for every student completing at least one of the following:

- Advanced Placement (AP) classes;
- International Baccalaureate (IB) program;
- Dual (concurrent) enrollment in postsecondary courses;

- An approved, work-based internship or apprenticeship; and/or
- Programs leading to industry certification.

Data from the 2015-16 school year show that the percentage of students participating in one of the courses ranges from 0% to 68%, with a median of 18% and a standard deviation of 10%. Thus, there is significant variation in this metric to provide meaningful differentiation among schools. To determine the postsecondary opportunities calculation, all students will be included in the denominator. In addition to receiving a letter grade for the participation of all students in postsecondary opportunities, the OSDE will also report this metric disaggregated by all ESSA student groups.

Schools are rewarded for helping their students gain early college or career exposure. Initially, this indicator measures participation but over a three-year period will move to crediting successful outcomes in the second and third years of implementation and as programs become more available to students (e.g., move from rewarding enrollment in an AP course to rewarding the receipt of a 3 or higher score on the AP test).

v. Annual Meaningful Differentiation (ESEA section 1111(c)(4)(C))

a. **Describe the State's system of annual meaningful differentiation of all public schools in the State, consistent with the requirements of section 1111(c)(4)(C) of the ESEA, including a description of (i) how the system is based on all indicators in the State's accountability system, (ii) for all students and for each subgroup of students. Note that each state must comply with the requirements in 1111(c)(5) of the ESEA with respect to accountability for charter schools.**

Oklahoma's system of annual meaningful differentiation of all public schools (including public charter schools) fulfills the requirements of the ESSA and represents a shift toward recognizing the value of multiple indicators to monitor students' progress toward college and career readiness. The Oklahoma system is based on all indicators in the accountability system and includes all students as well as those in each student group. These indicators reflect a greater value on progress and improvement of each school and each individual child.

As described in section 4(iv), Oklahoma has incorporated multiple measures of student performance which include:

- Academic achievement;
- Growth (elementary and middle schools);
- Graduation rate (including five- and six-year graduation rate in addition to the four-year graduation rate);
- EL progress;
- Postsecondary readiness (high schools); and
- Chronic absenteeism.

Oklahoma will categorize schools by grades A through F for each indicator and will issue an overview grade of all indicators. According to research by Learning Heroes, "Parents overwhelmingly appreciate and value a summative rating, especially when it is easily interpreted and familiar, such as an A-F letter grade… Parents find less value in subjective scales, such as "excellent" to "needs improvement." The full report is in Appendix 11. Grades will be awarded as follows:

- "A" means schools making excellent progress;
- "B" means schools making average progress;
- "C" means schools making satisfactory progress;
- "D" means schools making less than satisfactory progress; and
- "F" means schools failing to make adequate progress.

Each of the accountability indicators has a given weight and is summed to create an index, which was determined by carefully considering the relative weight of each indicator. Summing the final numbers produces an overall score between 0-~~90~~ 85 to deter "percent-correct" thinking.

The following is an example rubric of how scores may be converted to grades:

A: 70–90
B: 57–69.99
C: 43–56.99
D: 30–42.99
F: < 30

If, however, schools have fewer than ~~10~~ 25 in a given year, or 25 over a pooled most recent three-years of data, English learners across all grades, they will not have a score for that part of the index, making their total possible points 75. The ~~15~~10-point English language proficiency indicator would be removed from the index, reducing the total points possible from ~~90~~ 85 to 75 points. An example rubric in this case would be as follows:

A: 60–75
B: 47–59.99
C: 38–46.99
D: 25–37.99
F: < 25

The specific rubric used to assign letter grades will be identified following the calculation of baseline data to ensure that A's and F's are not over-identified. A criterion-referenced standard setting process to determine the proportion of letter grades across the system is described in Appendix B.

Disaggregated data on all indicators will also be reported for all students and by each student group identified in the response to section 4(i)(a) of the State Plan.

b. Describe the weighting of each indicator in the State's system of annual meaningful differentiation, including how the Academic Achievement, Other Academic, Graduation Rate, and Progress in ELP indicators each receive substantial weight individually and, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate.

Figure 7 describes the weighting of each indicator in the state's system of annual meaningful differentiation for elementary and middle schools. ~~The ELA and math academic achievement (1a and 1b), other academic (2, 3a and 3b), and progress in ELP (4) indicators comprise substantial weight individually (status, 33%; other, 39%; ELPA progress, 17%) and, in the aggregate (89%), much greater weight than the school quality indicator (chronic absenteeism, 11%). Because of the substantial weighting of the academic indicators (1-4) over the non-academic indicator (5), schools that show low performance of these substantially weighted indicators will be more likely to be identified for comprehensive or targeted support and improvement.~~

~~Figure 8 describes the weighting of each indicator in the state's system of annual meaningful differentiation for high school. The ELA and math academic achievement (1a and 1b), science academic achievement (2), progress in ELP (3), graduation rate (4) and growth in postsecondary opportunity (6) indicators comprise substantial weight individually (status, 33%; science, 17%; ELPA progress, 17%; graduation rate, 11%; postsecondary opportunity, 11%) and, in the aggregate (89%), much greater weight than the school quality indicator (chronic absenteeism, 11%) in the aggregate. Because of the substantial weighting of the academic indicators (1-4 and 6) over the non-academic indicator (5), schools that show low performance of these substantially weighted indicators will be more likely to be identified for comprehensive or targeted support and improvement.~~

Additionally, schools that earn an A grade but qualify for Targeted Support and Intervention (TSI) will receive a B grade on their report card.

Figure 7: Indicators and Weights for Elementary and Middle School Accountability Index

	Indicator	Weight
1a.	Performance Level Snapshot: English Language Arts ~~Status~~	~~15~~7.5
1b.	Performance Level Snapshot: Mathematics ~~Status~~	~~15~~7.5
2a.	Improvement Toward Expectations: English Language Arts	7.5
2b.	Improvement Toward Expectations: Mathematics	7.5
~~2~~3a.	Performance Level Snapshot: Science ~~Status~~	~~5~~2.5
3b.	Improvement Toward Expectations: Science	2.5
~~3a~~4a.	English Language Arts Growth	15
~~3b~~4b.	Mathematics Growth	15
~~4~~5.	English Language Proficiency Progress	~~15~~10
~~5~~6.	Chronic Absenteeism	10

Figure 8: Indicators and Weights for High School Accountability Index

	Indicator	Weight
1a.	Performance Level Snapshot: English Language Arts ~~Status~~	~~15~~7.5
1b.	Performance Level Snapshot: Mathematics ~~Status~~	~~15~~7.5
2a.	Improvement Toward Expectations: English Language Arts	7.5
2b.	Improvement Toward Expectations: Mathematics	7.5
~~2~~3a.	Performance Level Snapshot: Science ~~Status~~	~~15~~7.5
3b.	Improvement Toward Expectations: Science	7.5
~~3~~4.	English Language Proficiency Status	~~15~~10
~~4~~5.	Graduation Rate	10
~~5~~6.	Chronic Absenteeism	10
~~6~~7.	Postsecondary Opportunity	10

c. If the State uses a different methodology or methodologies for annual meaningful differentiation than the one described in 4.v.a. above for schools for which an accountability determination cannot be made (e.g., P-2 schools), describe the different methodology or methodologies, indicating the type(s) of schools to which it applies.

While Oklahoma's system of accountability is uniform across all schools, the state recognizes the need for sensible modifications to address the unique needs of specific populations of students, such as schools that do not have tested grades, alternative schools and schools that do not meet the minimum N-size of ~~10~~25. The OSDE will engage with other states, national experts and local stakeholders to ~~develop~~ consider modifications to the accountability system for non-traditional schools.

~~Potential~~ The following models being considered are part of OSDE's ongoing efforts to ensure that the accountability system reflects both the goals of the state and the state's ability to recognize the unique contexts associated with schools that serve unique student populations. The OSDE has made efforts to prioritize existing system operations and validity and is looking forward to exploring alternative accountability models to expand the schools that can be included in accountability to support continuous improvement efforts. ~~a~~Alternative accountability models that are being considered:

- Oklahoma's accountability model uses the Oklahoma School Testing Program (OSTP) assessments that begin in grade 3. For Pre-K-2 grade schools or grade-level centers (schools without a state assessment), the state may use the next tested grade level (i.e., third-grade achievement status for Pre-K-2) of the schools into which the students feed. All schools take attendance and give the English language proficiency test to students beginning in kindergarten. Under this model, the Pre-K-2 and grade-level centers can and will use their

own data for EL progress and chronic absenteeism, so these schools will not necessarily receive the same letter grade as their feeder schools.

- Alternative schools serving entirely at-risk students may have the same indicators as traditional schools but with heavier weight for the graduation rate indicator and chronic absenteeism to incentivize such behavior.

- Schools that do not meet the minimum number of students, 10 in a single year, may be averaged across three years so that a sufficient number of students is available. There would be a delay in the date of the first report card because multiple years of information would be required. If three years of information are required, the first report card will be released for the 2019-20 school year.

vi. Identification of Schools (ESEA section 1111(c)(4)(D))

The following strategies from the OSDE 8-Year Strategic Plan help to define the agency's work in supporting low-performing schools:

STRATEGY 1.2
Ensure effective implementation of the Oklahoma Academic Standards by using available data to target high-quality, aligned resources to educators.

STRATEGY 1.4
Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning.

STRATEGY 1.5
Reduce barriers to equity and close the opportunity and achievement gap for all students.

STRATEGY 2.2
Provide support and professional learning to increase instructional capacity for teachers and leaders.

STRATEGY 2.3
Provide district and school leaders with the training and support needed to improve instruction in their schools.

STRATEGY 3.3
Build and maintain working relationships and ongoing feedback mechanisms with diverse partners and advisory groups.

STRATEGY 4.1

Sustainably improve and strengthen agency capacity to fulfill its mission by sharing knowledge and best practices across all teams, developing skills and improving teamwork.

The OSDE office of school support's primary purpose is to meet the needs of the lowest-achieving students by providing on-site support, resources, technical assistance and guidance to schools statewide. As part of this "boots on the ground" approach, every school with a Comprehensive Support and Improvement (CSI) designation (formerly Priority) will receive at least one site visit each ~~semester~~ quarter throughout the school year, with many sites receiving additional visits based on their need. ~~This on-site support will also be provided to schools with low-performing subgroups resulting in a Targeted Support and Improvement (TSI) designation (formerly Focus) for multiple years.~~

The OSDE's ~~11~~12-member school support team is comparatively large in terms of the size of the state, but not by size of the need. Under the ESEA Flexibility Waiver, Oklahoma had more than 600 schools designated during the 2015-16 school year. In soliciting stakeholder feedback, the OSDE found an overwhelming desire for a strong relationship among struggling schools and the agency. In fact, 78% of respondents surveyed in the OSDE's live polling sessions stated that the OSDE's role in developing a local intervention plan should be one of a continual partnership with ongoing support (see Appendix 1).

~~The office of school support is committed to such partnerships. The support team, which also includes dedicated staff from the OSDE's office of special education, continues to push past a model purely based on compliance to one based on coaching for academic success.~~
To better support schools and students with multiple challenges, the OSDE will utilize CSI teams with representation from the agency's departments of school support, special education, EL/Title III, finance, federal programs, educator effectiveness, family/ community engagement and instruction/ curriculum to support struggling schools and build leadership capacity. This model moves beyond compliance coaching for academic success.

Developing positive on-site relationships with school leaders is a priority for the agency's school support specialists, who guide schools toward solving their own problems rather than relying on the OSDE to provide all the answers. Through a host of trainings, school support specialists help sites in leadership development, data inquiry, implementation of the Oklahoma Academic Standards and corresponding resources, accountability and state and federal law. The OSDE's specialists must be prepared to address a variety of potential school needs as they may be the chief point of contact for the site to the agency.

To make certain that important information is consistently shared with all sites, the OSDE's office of school support adheres to ~~fall and spring~~ quarterly site visits with designated schools. This process will continue during the transition to new requirements under the ESSA. School support specialists will work through a basic agenda ensuring all new information from the OSDE is reviewed, along with discussion about what is showing positive results, areas of concern and where supports are needed. A needs assessment based on the Oklahoma Nine Essential Elements of School Improvement, depicted in Figure 9, will help identify unique areas of focus for each site.

The Oklahoma Nine Essential Elements are a set of indicators proven through research to be effective as a continuous school improvement framework tool for all schools. These elements are based on research conducted by the Marzano Research Laboratory, which studied both high-achieving and low-achieving Oklahoma schools from 2009 to 2011.[27]

27 Marzano Research, "What Works in Oklahoma Schools: A Comprehensive Needs Assessment of Oklahoma Schools," March 1, 2011.

Prior to implementation of the ESSA, the Nine Essential Elements were optional for schools that did not otherwise have a needs assessment. Moving forward~~, however, both~~ CSI ~~and TSI~~ schools will be required to complete the Nine Essential Elements Needs Assessment as part of developing their targeted school improvement plan. The Nine Essential Elements Needs Assessment Survey can be found in Appendix 12.

Although the selection of interventions and strategies is a local decision over the first three years of designation, the office of school support will provide guidance and resources to help schools select evidence-based interventions based on the criteria defined under the ESSA. In this regard, school support specialists will encourage use of the What Works Clearinghouse and Evidence for ESSA website (www. evidenceforessa.org), a rich resource of programs that result in success for students.

The term "evidence-based" means a strategy or intervention that demonstrates a statistically significant effect on improving student outcomes (ESEA section 8101(21)(A)). The levels of evidence are as follows:

- Strong evidence – demonstrated by at least one well-designed and well-implemented experimental study;
- Moderate evidence – demonstrated by at least one well-designed and well-implemented quasi-experimental study; and
- Promising evidence – demonstrated by at least one well-designed and well-implemented correlational study with statistical controls for selection bias.

A fourth level is designed for ideas that do not yet have an evidence base qualifying as one of the first three levels. This fourth level is considered evidence-building and demonstrates a rationale based on high-quality research findings or positive evaluation that an intervention is likely to improve student outcomes.

Some examples of evidence-based strategies and interventions that the office of school support has relied upon in the past include co-teaching, professional learning communities, response to intervention (RTI) and positive behavior interventions and supports (PBIS). School support specialists may offer training in many of these strategies and professional development in areas such as the implementation of project-based learning, English learner strategies, changing the mindset as well as supports for implementing the Reading Sufficiency Act (RSA) and updates on new curriculum, standards, assessments and accountability.

INSERT FIGURE 9 ABOUT HERE

Additionally, to support LEAs in the implementation of evidence-based strategies to improve student academic achievement, the OSDE will:

- Provide technical assistance to LEAs by creating a model process for the completion of the Nine Essential Elements Needs Assessment that engages stakeholders in an effort to assess root causes;
- Train and partner with LEAs and school staff to utilize the needs assessment in order to inform selected evidence-based practices;
- Develop and post a state-approved list of evidence-based interventions;
- Offer professional development on matching evidence-based best practices to locally identified needs; and
- Provide intense support and monitoring of the implementation of evidence-based practices.

~~For those LEAs not utilizing the suggested evidence-based interventions, a~~An LEA seeking an intervention ~~not on the provided list~~ will need to supply evidence of selection based on the following criteria:

- Evidence that the intervention is statistically proven to make an impact on student success;
- Evidence that the intervention has been tested/implemented in similar demographic settings as the LEA; and
- Evidence that the tested intervention is more effective than standard practice.

Comprehensive Support and Improvement Structure

The OSDE has many opportunities to capitalize on the flexibility provided by the ESSA to maximize capacity for serving districts. Oklahoma's low socioeconomic students often have wide-ranging needs. They may also need special education and EL supports in addition to having needs that stem from attendance at a low-performing school. Therefore, the OSDE is developing a system of cross-programmatic collaboration led by the OSDE office of school support to holistically address the needs of low-performing schools by combining state and federal funds.

To better support schools and students with multiple challenges, the OSDE will utilize CSI teams with representation from the agency's departments of school support, special education, EL/Title III, finance, federal programs, educator effectiveness, family/ community engagement and

instruction/ curriculum to support struggling schools and build leadership capacity ~~To better support schools and students with multiple challenges, the OSDE will utilize CSI teams with representation from the agency's departments of school support, special education, EL/Title III, finance, federal programs, educator effectiveness, family/community engagement and instruction/curriculum to support struggling schools and build leadership capacity.~~

In allocating school improvement dollars, the OSDE will use a formula allocation in combination with a competitive grant. These funds are intended to be used for supplemental supports to quickly help low-performing schools see significant academic improvement. LEAs may choose to work with an external provider to assist in professional development and support.

External Provider

~~When determining how school improvement dollars are spent, LEAs must not overlook the impact of an outside professional development provider. These providers are considered "supplemental" in that they are neither a requirement nor particularly affordable in the midst of budgetary challenges.~~

~~In the wake of Oklahoma's school funding crisis, many districts have cut staff positions, with increased duties falling to principals. Many principals subsequently find themselves in "management-and-survival-mode" instead of concentrating on instructional leadership. Schools with an outside staff development provider typically appear to be more driven and focused on the needs of their students and the overall school improvement process.~~

An outside professional development provider can maintain focus on improving instruction and providing support in prioritizing improvement strategies and resources to meet the needs of the lowest-achieving students. This approach enables greater opportunity for on-site coaching and building capacity for enduring gains. Whether schools use a competitive grant to bring in a national provider or formula school improvement dollars to work collaboratively with independent consultants, the improvement in the quality of education provided to students is evident and often significantly more pronounced. ~~Schools that elect to hire an outside resource traditionally have the greatest gains and often exit designation status.~~ The LEA must rigorously review the proposal and work of the external provider each year.

Another key to the success of the office of school support is allocating school improvement funds at the site level, in contrast to many other states that do so at the LEA level. Oklahoma will continue to allocate at the site level to ensure resources and support for each school with a designation are equitable. These funds are a set-aside from the state's Title I budget and are intended to meet the needs of the lowest-achieving students. ~~During~~ Through site visits, technical assistance and desktop monitoring, the OSDE works collaboratively with sites and districts to ensure every dollar is ~~maximized~~aligned to the Nine Essential Elements and meets the requirement of tiered evidence. Friendly reminders – such as supplement vs. supplant and maintenance of effort – are provided during site visits to assist sites in decision-making.

The office of school support will ~~develop and implement a multitier intervention support system based on the individual and differentiated needs of students, teachers and administrators.~~ Utilize the Oklahoma Student Support Framework to assist districts in implementing tiered systems of support. -The OSDE understands that simply directing interventions at the school level may not

result in improvement of student achievement if district policies and practices either create barriers or do not explicitly support required interventions.

The office of school support's system of support and monitoring for CSI ~~and TSI~~ schools, also depicted in Figure 10, includes:

- Assignment of a school support specialist;
- Needs assessment review;
- Quarterly site visits with an emphasis on the Oklahoma Nine Essential Elements and goals based on the site's needs assessment;
- Consistent communication via email, newsletter, webinars and on-site support;
- Support in the creation of a prescriptive schoolwide/school improvement plan via the Grants Management System (GMS); and
- Technical assistance regarding the application, budget and claims process throughout the year.

INSERT FIGURE 10 ABOUT HERE

The office of school support uses GMS for desktop monitoring throughout the year, with each site application and budget reviewed three times before approval. The schoolwide/ school improvement plan is reviewed, amended as needed and approved based on its plan to use the funds to improve the academic achievement of all students.

Additionally, the school support specialist will help designated schools determine how to best utilize their school improvement funding by identifying interventions and resources aligned to their needs, as determined by the needs assessment. In order for schools to see such interventions in action, specialists frequently encourage conversations between newly designated sites and sites that have seen improvement through a specific intervention. These conversations can foster peer-to-peer learning among struggling schools, which contributes to helping meet the needs of the lowest-achieving students by providing on-site support, resources, technical assistance and guidance.

Additional Targeted Support and Improvement (ATSI) Support Structure

ATSI schools will receive support from a school support team who will assess the needs of the ATSI schools by subgroup and provide resources and professional development according to those needs.

Those resources and support can include:

- Quarterly regional training with an emphasis on the Oklahoma Nine Essential Elements and goals based on the site's needs assessment;
- Consistent communication via email, newsletter, webinars and on-site support;
- Support in the creation of a prescriptive schoolwide/school improvement plan via the Grants Management System (GMS); and
- Technical assistance regarding the application, budget and claims process throughout the year.

Support for ATSI designated schools will be dependent upon funding and the capacity of the school support team. Ideally, ATSI leadership teams will use the Nine Essential Elements needs assessment and root cause analysis similar to CSI schools. If the capacity of the school support team increases, ATSI schools will be able to have the same support as CSI schools.

a. Comprehensive Support and Improvement Schools. Describe the State's methodology for identifying not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement, including the year in which the State will first identify such schools.

Oklahoma will identify schools as Comprehensive Support and Improvement (CSI) and Additional Targeted Support and Improvement (ATSI) from among all schools in the state, not simply Title I, Part A eligible schools. At a minimum elementary and middle schools that earn an F on the ~~Oklahoma A-F School Report Card~~ Oklahoma School Report Cards will be categorized as comprehensive support schools. For high schools the same criteria apply, but graduation rates are also a consideration. Any high school with a graduation rate of 67% or lower will be identified as needing CSI.

Oklahoma's implementation of more rigorous standards and assessments necessitates calibrating the new A-F accountability system. It is natural and expected that assessment scores will dip; as a result, it will be harder to reach the targeted goals of the status and growth indicators of the accountability system. Therefore, in the baseline year (2017-18), the model will be calibrated so that approximately 5% of schools will receive an F and 5% will receive an A. This adjustment is necessary initially to ensure an appropriate spread of grades. Achieving an A score under the new assessments will be very challenging. As a majority of schools improve, however, the rubric will be adjusted so that an A highlights the greatest successes. After an examination of empirical findings, several revisions are being proposed to the system of Annual Meaningful Differentiation. The state will identify the next round of CSI schools in fall 2021 using data from the most recent year's assessment (i.e., SY 2020-2021), which is when the proposed system will be first reported.

While there will be some alignment between those schools identified for CSI and schools that receive an F,

If fewer than 5% of schools receive an F, the schools in the lowest 5% of overall points for each model (e.g., high school, elementary and middle school) will be identified for comprehensive support. In the event that the aforementioned methodology results in less than 5% of Title I schools

being designated as CSI, the OSDE will identify the accountability score at the fifth percentile of Title I schools and designate all Title I schools below that score as CSI.

The ~~first~~ next year Oklahoma will identify schools for CSI will be ~~2018-19~~2021-2022, using results from SY 2020-2021. Every three years, the model will be reviewed to determine if new criteria are needed.

b. Comprehensive Support and Improvement Schools. Describe the State's methodology for identifying all public high schools in the State failing to graduate one third or more of their students for comprehensive support and improvement, including the year in which the State will first identify such schools.

High schools with graduation rates of 67% or lower in the four-year cohort will be identified for CSI. To address the fact that Oklahoma has many rural schools with fewer than 100 total students and graduation classes as small as six students, a three-year average will be used to account for volatility in the graduation rate. The first year Oklahoma will identify schools for CSI identification for graduation rate will be 2018-19. Oklahoma will continue to identify schools for CSI using graduation rate as soon as the new system can be operational (e.g., fall 2021 using SY 2020-2021 data).

c. Comprehensive Support and Improvement Schools. Describe the methodology by which the State identifies public schools in the State receiving Title I, Part A funds that have received additional targeted support under ESEA section 1111(d)(2) (C) (based on identification as a school in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4) (D)) and that have not satisfied the statewide exit criteria for such schools within a State-determined number of years, including the year in which the State will first identify such schools.

Schools that remain identified for ATSI for three consecutive years due to a lack of improvement within the same student group and that have not satisfied the statewide exit criteria will be deemed "chronically low performing" and designated CSI. ~~The first year Oklahoma will identify schools for TSI will be 2019-20.~~ The first year Oklahoma will designate chronically low performing schools as CSI is 202~~2~~4-2~~3~~5, based on an identification of ATSI schools in fall 2021, using SY 2020-2021 data.

Figure 11: ESEA to ESSA Timeline

New NCBL Waiver	2015 Priority and Focus Designation List	2016 Priority and Focus Designation List Schools May Exit Designation Status Transition to New Standards, Assessments, Accountability	2016 Designation List Remains in Effect Schools May Exit Designation Status New A-F Report Card	CSI Cohort 1 – Identification Year 1 of services ATSI Designations	CSI Cohort 1 – Year 2 of services TSI designations in Fall 2019 using SY 2018-2019 data	CSI Cohort 1 Enters Year 3 of services No TSI Designations in Fall 2020 due to COVID waivers	CSI Cohort 2 (Revised System) – Identification Year 1 of services (using SY 21 data) CSI Cohort 1 Enters Year 4, Receives More Rigorous Interventions New ATSI Designations (Revised System) Using SY 21 Data New TSI Designations (Revised System) for Consistently Low-Performing Schools (using most recent years of available data)	CSI Cohort 2 (Revised System) Enters Year 2 of services CSI Cohort 1 Enters Year 5, Receives More Rigorous Interventions New TSI Designations (Revised System) for Consistently Low-Performing Schools (using most recent years of available data)	CSI Cohort 2 (Revised System) Enters Year 3 CSI Cohort 1 Enters Year 6, Receives More Rigorous Interventions CSI Cohort T1 Enters Year 2 New TSI Designations (Revised System) for Consistently Low-Performing Schools (using most recent years of available data)
2014-15	**2015-16**	**2016-17**	**2017-18**	**2018-19**	**2019-20**	**2020-21**	**2021-22**	**2022-23**	**2023-24**

d. Frequency of Identification. Provide, for each type of school identified for comprehensive support and improvement, the frequency with which the State will, thereafter, identify such schools. Note that these schools must be identified at least once every three years.

Schools will be assessed annually. With the current revision, ~~Beginning in 2018-19,~~ schools will be identified for CSI every three years with the ability to exit the designation when they show improvement from the previous year starting in the fall of 2021, using SY 2020-2021 data.

Designations will occur every three years beginning in year ~~2018-19 for first-year cohort support~~ 2021-2022 for the first year of cohort support under the revised system. The OSDE will re-evaluate the designation cycle at the end of ~~2020-21~~2024-2025, using 2023-2024 data to ensure the individual needs of the schools are being met. If evidence supports the need for earlier support and intervention by the OSDE, a modification to the ESSA plan will be submitted to the USDE for approval.

For sites that fail to exit CSI during the three years of support for cohort 1, the OSDE will increase the amount of support and rigor based on the needs of the individual sites. Figure 11 illustrates the timeline for identification.

e. Targeted Support and Improvement. Describe the State's methodology for annually identifying any school with one or more "consistently underperforming" subgroups of students, based on all indicators in the statewide system of annual meaningful differentiation, including the definition used by the State to determine consistent underperformance. (ESEA section 1111(c)(4)(C)(iii))

To identify schools that need Targeted Support and Improvement, Oklahoma will analyze school performance within each subgroup annually as required by the ESSA [i.e., race/ ethnicity (White, Hispanic/Latino, Black/ African American, American Indian, Asian/ Pacific Islander and Two or More Races), socioeconomic status, disability and English learners (ELs)].

Oklahoma defines sites as consistently low performing when at least one subgroup (as listed above) ~~is in the bottom 5% on two or more indicators in the accountability system. Oklahoma will calculate each indicator for each subgroup using the methodology where each student is included in every applicable group. All schools in the bottom 5% on two or more indicators for at least one subgroup~~ in a school is in the bottom 10% of that respective subgroup for three years in a row. The state will define a "consistently underperforming" subgroup as a subgroup that falls below the 10th percentile for that subgroup for three (3) consecutive years, which includes all required indicators in the system of Annual Meaningful Differentiation. Each individual subgroup will be treated as its own population. Doing so ensures that all schools must address their lowest performing subgroups, further prioritizes the OSDE's goal that "all students can grow," and serves as an "early warning" to sites. The first year of identification for TSI will be fall 2021 using the most recent three years of data available.

This ensures that all schools must address the lowest performing subgroups, even if certain student groups are higher performing than others. This way, all subgroups and schools are expected to prioritize continuous improvement. Furthermore, this will prioritize every student counts because every student group regardless of performance will be eligible for targeted support and improvement, reinforcing the state's goal of all students growing, every school counting, and every student counts. Any school that has a "consistently underperforming subgroup" will be identified for Targeted Support and Intervention (TSI).

~~Prior to ranking, data will be averaged across the most recent three years. These sites will be designated as TSI schools with the first year of designation being in 2019-20. This designation will be based on data from the 2017, 2018 and 2019 school years. Subsequently, sites that receive a TSI designation for three consecutive years will be considered chronically low performing and receive a CSI designation.~~

Based on simulated analyses using previously available data (i.e., data from SY 2017-2018 and 2018-2019), 204 school sites would receive a TSI designation. ATSI schools will be identified from this pool of schools. ~~It is unknown at this time the number of sites that will receive a TSI designation. In order to provide appropriate supports to TSI schools, the OSDE will closely monitor the subgroup results over the next three years and develop a multitier system of support based on these results and the number of schools potentially identified. The OSDE's capacity to serve these schools and available funding will be a contributing factor in the development of the multitier plan.~~

f. Additional Targeted Support. Describe the State's methodology for identifying schools in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c) (4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D), including the year in which the State will first identify such schools and the frequency with which the State will, thereafter, identify such schools. (ESEA section 1111(d)(2)(C)-(D))

~~In the beginning of the 2018-19 school year, upon finalization of report card calculations, Oklahoma will notify schools meeting the criteria for additional targeted support using prior-year data. For additional targeted support, Oklahoma will apply the methodology outlined for Comprehensive Support and Improvement (CSI) in section 4(vi)(a). A school will be notified if, upon the subgroup calculation by indicator (as described in section 4(vi)(e)), the cumulative score for the subgroup across all indicators is equal to or lower than the cumulative score that represents the 5th percentile for the cumulative score of all students (i.e., the cut score used to identify schools for CSI). In other words, the subgroup performance, on its own, would lead to identification under the methodology for CSI.~~ Additional Targeted Support and Improvement (ATSI) schools will be identified from those schools identified for Targeted Support and Improvement (TSI). Using the list of TSI schools, any school in which any subgroup of students, on its own, would be identified as CSI will be identified as ATSI.

The first year Oklahoma will be identified ATSI will be the first year for which three years of data will be available for TSI identification. We anticipate identifying ATSI schools in the fall of 2021 school year using school year 2020-2021 data.

For example, the OSDE will calculate points under each indicator for a given subgroup (using traditional grouping methodology, where a student is assigned to each applicable subgroup). For the Hispanic/ Latino subgroup, this calculation means the academic achievement indicator points will reflect the percentage of all Hispanic/Latino students meeting their priority student group target combined with the percentage of proficient Hispanic/Latino students (using the methodology outlined in section 4(vi) (a)). Similarly, the academic growth indicator would reflect the average growth made by all Hispanic/Latino students. The chronic absenteeism indicator would reflect the percentage of Hispanic/Latino students not chronically absent. This process would be utilized the system of Annual Meaningful Differentiation (AMD), which includes all required indicators~~for all indicators~~. The cumulative score across the system of AMD ~~all indicators~~ for a particular subgroup will be compared to the 5th percentile of cumulative scores for all students using the system of AMD (I.e., the threshold used for CSI identification). Any school with a cumulative subgroup score at or below the CSI score that is also a TSI school (5th percentile for all students cumulative score) would meet criteria for additional targeted support. In other words, the methodology for identifying schools for additional targeted support will be identical to the methodology for identifying schools for CSI for each subgroup, and selected from those schools identified as TSI.

Oklahoma will closely monitor the ~~notification~~ identification of schools for additional targeted support. As capacity to serve and support schools is of paramount importance, the OSDE will analyze and regulate the designation process to ensure effectiveness.

g. Additional Statewide Categories of Schools. If the State chooses, at its discretion, to include additional statewide categories of schools, describe those categories.

The OSDE intends to select the best-of-the-best A schools to receive a special recognition for excellence. Because Oklahoma has recently adopted a new accountability system, the first complete set of school grades will not be available until after the 2017- 18 school year. After the proposed revision, schools grades for best-of-the-best will be based on grades from SY 2020-2021. ~~It is, therefore, difficult to determine how schools will be designated to receive such recognition, or whether there will be sufficient differentiation at the top to be warranted.~~ The OSDE is considering designating schools as reward schools that have no large achievement gaps and a participation rate above 95%. A reward school must also have an overall graduation rate of at least 85% with no student group falling below 75%. The OSDE, however, will not allocate Title I, Part A funds to these schools.

vii. Annual Measurement of Achievement (ESEA section 1111(c)(4)(E)(iii)): Describe how the State factors the requirement for 95 percent student participation in statewide mathematics and reading/language arts assessments into the statewide accountability system.

The state maintains student enrollment in a statewide student information system (the Wave). In accordance with the ESSA and to maintain a valid system of school accountability, all students who are enrolled in grades 3-8 and 11 at the time of testing are required to participate. All high school students must take the college- and career-ready assessment, as well as any enhancement items needed for science and U.S. history. Schools with participation rates for all students lower than 95% will be given a minus after their overall ~~A-F School Report Card~~ Oklahoma School Report Card grade. Likewise, any school that has one or more ESSA subgroups of students with less than a 95% participation rate will receive a minus after their overall report card grade. If a school has special circumstances (i.e., the degree to which the school missed the requirement, disproportionately skewed data because of small N-size student subgroups, etc.), it can petition the OSDE for a special exemption.

Figure 12 simulates how the state will take into account the 95% participation rate on the school report card. The "All Students" accountability subgroup shows 95% tested, but the "American Indian/Alaska Native" subgroup only tested 64%. Therefore, the letter grade for this sample school would include an asterisk (*). ~~minus (-)~~.

viii. Continued Support for School and LEA Improvement (ESEA section 1111(d)(3)(A))

a. Exit Criteria for Comprehensive Support and Improvement Schools. Describe the statewide exit criteria, established by the State, for schools identified for comprehensive support and improvement, including the number of years (not to exceed four) over which schools are expected to meet such criteria.

A CSI school site that does not meet the exit criteria within three years will be given additional, more rigorous interventions. Site support will begin with the first year of designation, working collaboratively with the LEA. An increase in support at the LEA level will occur when sites do not meet exit criteria in three years. Schools can exit CSI status at any time during the three-year cycle when:

- A site designated due to performing in the lowest 5% of Oklahoma schools improves the total score such that student performance is no longer in the bottom 5% of Oklahoma schools at any time during the three-year designation cycle (a school will not exit CSI status if it is no longer in the bottom 5% but its score did not improve); or

- A site designated due to graduation rates below 67% increases the school's four-year graduation rate to be at or above 67% for high schools if the school was designated for this reason; or

- A site designated for lack of improvement in a chronically low-performing student group improves the performance of the chronically low-performing student groups such that the student group has surpassed, at any point during the three-year designation cycle, similarly situated student groups in schools in the bottom 5%.

b. Exit Criteria for Schools Receiving Additional Targeted Support. Describe the statewide exit criteria, established by the State, for schools receiving additional targeted support under ESEA section 1111(d)(2)(C), including the number of years over which schools are expected to meet such criteria.

Annually, schools can exit ATSI designation when the underperforming student group for which they were identified demonstrates ~~substantial~~ improvement ~~(i.e., performance in year 4 is greater than in year 3, or year 4 is greater than the composite of the three prior years),~~ and such improvement ~~must also~~ brings the school out of the bottom 5% for that particular student group. ~~The threshold of substantial improvement will be determined once the state has multiple years of data under the new accountability system and can empirically establish an expected rate of improvement that is both statistically significant and meaningful.~~

c. More Rigorous Interventions. Describe the more rigorous interventions required for schools identified for comprehensive support and improvement that fail to meet the State's exit criteria within a State-determined number of years consistent with section 1111(d)(3)(A)(i) (I) of the ESEA.

Oklahoma intends to implement tailored approaches to more rigorous interventions, focusing on the needs of individual schools instead of providing a one-size-fits-all approach to school improvement. Upon review of the needs assessment, Oklahoma may deploy any number of interventions. The OSDE's approach to more rigorous interventions is summed up by the words of Andy Hargreaves of Boston College's Lynch School of Education, who said, "One of the ways teachers improve is by learning from other teachers. Schools improve when they learn from other schools. Isolation is the enemy of all improvement."[28]

28 Pasi Sahlberg, *Finnish Lessons 2.0: What the World Can Learn from Educational Change in Finland* (New York: Teachers College Press, 2014).

Oklahoma is a state staunchly rooted in the ideals of local control. The OSDE respects an LEA's right to have the opportunity to first implement local solutions in low-performing schools. The OSDE will work alongside low-performing schools with support, direction and resources in hopes that locally selected, evidence-based interventions are successful. However, should a school not exit designation status after implementing a locally selected intervention over a period of three years, the state must intervene. After a comprehensive review of a school's needs, the OSDE may require many of the strategies that were optional during the first three years of designation – a gradual loss of local control until the school is able to exit designation status.

During the first three years of designation, a school site will have the freedom to choose an evidence-based intervention that fits its needs. After this timeframe, CSI schools will be required to adopt specific, more rigorous interventions selected by the OSDE.

In addition, decisions regarding tailored interventions will be based on state-level data and the school's needs assessment. These interventions may include but are not limited to the following:

- Implementation of state-approved supplemental, evidence-based supports and resources (as previously discussed);

- Required professional development based on the needs assessment completed by the OSDE CSI team (as previously discussed);

- Required participation in instructional leadership development training to build capacity in curriculum/instruction; classroom evaluation/assessment; school culture; student, family and community engagement; collaborative leadership; organizational structures and resources; and comprehensive and effective planning;

- Participation in a Networked Improvement Community (NIC);

- ~~Mandatory five-day school week equaling a minimum of 170 days (if the school's current calendar is shorter at the time of designation)~~OSDE review of school calendars to ensure adequate instructional days and professional learning days;

- Implementation of a high-quality supplemental child nutrition program; or

- Amplification of the effective school librarian role to provide personalized learning environments, equitable access to resources, instructional leadership and current digital and print materials. The last five of these research-supported interventions deserve a closer look.

INSTRUCTIONAL LEADERSHIP DEVELOPMENT TRAINING

Development of a strong principal pipeline directly impacts every school in Oklahoma. Current parallel efforts by school districts, principal preparation programs and other separate organizations offer sporadic opportunities for leadership training. However, aligning leadership standards and professional learning supports will create a leadership pipeline to guide and ground principal recruitment, preparation, hiring, evaluation and support. Administrators who are properly trained on a continual basis in best practices and strong pedagogy can offer sound feedback and reflection for their teaching staff. In turn, this comprehensive approach strengthens the evaluation process and leads to enhanced educator growth and collaboration, which will directly affect Oklahoma's goal of reducing by 95% its reliance on emergency-certified teachers by 2025.